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July 5, 2017

Honorable Cathy Seibel
United States District Court – SDNY
300 Quarropas Street
White Plains, New York 10601


Re: TAL PROPERTIES OF POMONA, LLC, AVROHOM MANES vs.
VILLAGE OF POMONA, et al., 17 cv 02928 (CS)

Dear Judge Seibel,

Plaintiffs have retained me in the above-noted matter and I am filing my notice of appearance this afternoon. Attached please find a proposed First Amended Complaint [FAC]. I note that I have added Mr. Manes as a plaintiff and subtracted many defendants. I would request leave to file the FAC.

I understand that defendants filed a pre-motion letter as against the Complaint predecessor counsel filed. I believe the FAC addresses these issues and more clearly explains plaintiffs' claims. However, I respect the right of defendants' counsel to object to this filing or to move as against the FAC. Please advise how the court would like to proceed so as to efficiently resolve any such issues and my application to file the FAC.

Respectfully submitted,


Michael H. Sussman [3497]

enc/ Proposed First Amended Complaint

cc: Defendants' counsel by ECF with enclosed FAC

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